







January 26, 2009

State of California
Department of Water Resources
Division of Planning and Local Assistance
Attn. Ralph Svetich
Post Office Box 942836
Sacramento, California 94236-0001

RE: Comments on Draft IRWM Regional Acceptance Process Guidelines – 30 day Public Comment Starting December 22, 2008

Mr. Ralph Svetich,

Our joint Public Entities appreciate the opportunity to comment on the Draft IRWM Regional Acceptance Process Guidelines. Overall we feel the process outlined within the draft document is fair and equitable. We look forward to further addressing our joint water management strategies through the Integrated Regional Water Management process.

Jointly we have agreed in the spirit of collaborative local and regional water management planning to submit the following comments for your review and consideration:

- Considering the aggressive timeline outlined within the draft document we would like to request DWR representatives begin meeting now with potential regional partners to offer guidance and feedback on regional applications as outlined in Step 3 of the IRWM RAP Review Steps on page 5 of the draft document.
- We encourage DWR to consider local governance structures and extend the 30 day period for RWMG's to prepare RAP materials to at least 120 days. 30 days does not allow sufficient time to coordinate multiple local governments to establish a region.
- The draft document states within the "Purpose" statement that DWR will conduct annual RAP reviews or may conduct RAP reviews with upcoming grant solicitation cycles. We encourage DWR to conduct these reviews on an informal basis as annual resubmission of IRWM regions and justification of those regions

- will interfere with the development of the IRWM planning process and place an unnecessary burden on the participating local government agencies. The existing process already facilitates regional boundary modifications.
- The draft document "Background" section describes how SB1 legislation directs DWR to develop a process to approve the composition of the regions for purposes of the Proposition 84 IRWM Program. We encourage DWR to evaluate the regions based on local and regional management efforts in the proposed planning areas and not to base regions on specific projects related to immediate grant funding.

Our prospective entities look forward to the opportunity to collaborate and maximize integration of water management activities related to both natural and man-made water systems, including water supply reliability, water quality, environmental stewardship, flood management, and other water systems as listed on page 2 of the draft document.

All of our water portfolios are dynamic and at the same time connected; directly and indirectly. To date, several meetings have already been held between various entities that include staff from the Four Counties Group (Glenn, Butte, Tehama, and Colusa), Sutter County, Yuba County Water Agency, Yuba City, Sutter County Resource Conservation District, and the Northern California Water Agency. In addition, DWR has met with various entities listed above recently concerning existing and future IRWM regions. Currently we are still evaluating the various alternatives related to regional boundaries for eventual submission through the RAP process.

We look forward to future collaboration and coordination between ourselves and DWR. Thank you in advance for your consideration of our comments on the Draft IRWM Regional Acceptance Process Guidelines.

Should you need to contact any of our parties directly, our contact information is as follows:

Jim Goodwin, City Manager for the City of Live Oak can be reached via e-mail at citymgr@liveoak.org or by phone at (530) 695-2112

William Lewis, Director of Utilities for the City of Yuba City can be reached via e-mail at blewis@yubacity.net or by phone at (530) 822-4319.

Douglas Gault, Director of Public Works for Sutter County can be reached via e-mail at DGault@co.sutter.ca.us or by phone at (530) 822-7450.

Ryan Bonea, Executive Director for Sutter County Resource Conservation District can be reached via e-mail at Ryan.Bonea@ca.nacdnet.net or by phone at (530) 674-1461 ext. 130.

Sincerely,



Jim Goodwin, City Manager City of Live Oak



William P. Lewis, Director of Utilities

City of Yuba City



Douglas R. Gault, Director of Public Works Sutter County

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Ryan Bonea, Executive Director

Sutter County Resource Conservation District